

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SV

ELH-19-286

One

(Conspiracy to Distribute and Possess with the Intent to Distribute Controlled Substances, 21 U.S.C. § 846; Possession with the Intent to Distribute Controlled Substances, 21 U.S.C. § 841(a)(1); Possession of a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(c); Possession of a Firearm and Ammunition by a Prohibited Person, 18 U.S.C. § 922(g)(1); Money Laundering, 18 U.S.C. § 1956, Aiding & Abetting, 18 U.S.C. § 2; Forfeiture, 21 U.S.C. § 853, 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c))

* * * * *

COUNT ONE

The Grand Jury for the District of Maryland charges that:

1

**DANIEL BLUE,
BRIAN BLACKSTON,
a/k/a "SO BIG,"
DEREK CROSBY,
a/k/a "MICE,"
GEORGE DRUMMOND,
MALIK WILLIAMS,
a/k/a "FREAKY,"
WARDELL ROUNDHEART,
ANTON WILLIAMS,
a/k/a "TWAN,"**

did knowingly and willfully combine, conspire, confederate and agree with one another and with others known and unknown to the Grand Jury to distribute and possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl] propanamide, also known as fentanyl, a Schedule II controlled substance, five kilograms or more of and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of 21 U.S.C. § 841.

MANNER AND MEANS OF THE CONSPIRACY

1. Among the manner and means by which the defendants and others conducted and participated in the conspiracy were the following:
2. Members and associates of the Montford and OTM Drug Trafficking Organizations distributed narcotics in and around the 400 block of North Montford Avenue at Jefferson Street

Baltimore, Maryland and in and around the 2400 block of East Monument Street at Port Street, Baltimore Maryland.

3. Members of conspiracy distributed heroin, fentanyl, cocaine, and crack cocaine to customers.

4. Members of the conspiracy conducted narcotics sales on a daily basis, operating in rotating shifts to ensure continuous distribution.

5. Members of the conspiracy sold bulk quantities of narcotics to other drug traffickers who, in turn, redistributed the narcotics in and around Baltimore.

6. Members of the conspiracy adulterated heroin and cocaine base to maximize their profits, cutting the drugs with other substances.

7. Members of the conspiracy used residences in and around Baltimore, Maryland to process, cut, repackage, and prepare heroin and cocaine base for distribution.

8. Members of the conspiracy frequently changed cell phones to prevent the interception of drug-trafficking communications by law enforcement.

9. Members of the conspiracy possessed firearms in furtherance of their drug trafficking activities, including this conspiracy.

21 U.S.C. § 846

COUNT TWO

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about January 8, 2019, in the District of Maryland, the defendant,

DANIEL BLUE,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit: (1) a Taurus Judge .45 caliber/410 revolver, serial number LU474889, loaded with 3 cartridges of .410 gauge shells ammunition and (2) a Kahr Arms .45 caliber semi-automatic pistol, serial number CA5313, loaded with 5 cartridges of ammunition, and the firearm and ammunition were in and affecting commerce.
18 U.S.C. § 922(g)(1)

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about January 8, 2019, in the District of Maryland, the defendant,

DANIEL BLUE,

did knowingly possess a firearm, to wit: a Taurus Judge .45 caliber/410 revolver, serial number LU474889, and a Kahr Arms .45 caliber semi-automatic pistol, serial number CA5313, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances in violation of Title 21, United States Code, Section 846, as alleged in Count One of this Superseding Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)

18 U.S.C. § 2

COUNT FOUR
(Possession of Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about June 21, 2019, in the District of Maryland, the defendant,

DERREK CROSBY,
a/k/a "MICE,"

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a .40 caliber Smith and Wesson, semi-automatic pistol, bearing serial number FWN8660, and the firearm was in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT FIVE

(Possession with Intent to Distribute Cocaine, Heroin, and Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about June 19, 2019, in the District of Maryland, the defendant,

DEREK CROSBY,
a/k/a "MICE,"

did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl] propanamide, also known as fentanyl, a Schedule II controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

21 U.S.C. § 841(b)(1)(B) and (b)(1)(C)
18 U.S.C. § 2

COUNT SIX

(Possession with Intent to Distribute Heroin and Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about January 23, 2019, in the District of Maryland, the defendant,

GEORGE DRUMMOND,

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl] propanamide, also known as fentanyl, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(B)

18 U.S.C. § 2

COUNT SEVEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about January 23, 2019, in the District of Maryland, the defendant,

GEORGE DRUMMOND,

did knowingly possess a firearm, to wit, a Glock 37, .45 caliber semi-automatic pistol, serial number GAF795, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as alleged in Count One of this Superseding Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)

18 U.S.C. § 2

COUNT EIGHT

(Possession of Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about January 23, 2019, in the District of Maryland, the defendant,

GEORGE DRUMMOND,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit: a loaded a Glock 37, .45 caliber semi-automatic pistol, serial number GAF795, and 8 cartridges of ammunition, and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT NINE
(Possession with Intent to Distribute Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about October 30, 2018, in the District of Maryland, the defendant,

MALIK WILLIAMS,
a/k/a “FREAKY,”

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]propanamide, also known as fentanyl, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(C)
18 U.S.C. § 2

COUNT TEN

(Possession with Intent to Distribute Cocaine and Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about June 25, 2019, in the District of Maryland, the defendant,

**MALIK WILLIAMS,
a/k/a "FREAKY,"**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]propanamide, also known as fentanyl, a Schedule II controlled substance, and a quantity of a mixture or substance containing a detectable amount of cocaine, a Scheduled II controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(C)
18 U.S.C. § 2

COUNT ELEVEN
(Possession with Intent to Distribute Fentanyl and Cocaine)

The Grand Jury for the District of Maryland further charges that:

On or about February 22, 2019, in the District of Maryland, the defendant,

WARDELL ROUNDHEART

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]propanamide, also known as fentanyl, a Schedule II controlled substance, and a quantity of a mixture or substance containing detectable amount of cocaine base, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(C)

18 U.S.C. § 2

COUNT TWELVE
(Possession with Intent to Distribute Fentanyl)

The Grand Jury for the District of Maryland further charges that:

On or about May 22, 2019, in the District of Maryland, the defendant,

ANTON WILLIAMS,
a/k/a "TWAN,"

did knowingly and intentionally possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)piperidin-4-yl]propanamide, also known as fentanyl, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(B)

18 U.S.C. § 2

COUNT THIRTEEN

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

On or about May 22, 2019, in the District of Maryland, the defendant,

**ANTON WILLIAMS,
a/k/a "TWAN,"**

did knowingly possess a firearm, to wit, a Colt Army Special .38 caliber revolver, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as alleged in Count One of this Superseding Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)

18 U.S.C. § 2

COUNT FOURTEEN

(Possession of Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about May 22, 2019, in the District of Maryland, the defendant,

**ANTON WILLIAMS,
a/k/a "TWAN,"**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit: a Colt Army Special .38 caliber revolver, serial number 308378 and ammunition, and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT FIFTEEN
(Money Laundering)

The Grand Jury for the District of Maryland charges that:

On or about February 2019, in the District of Maryland, the defendant,

ANTON WILLIAMS,
a/k/a "TWAN,"

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, payment of approximately \$50,000 in U.S. currency to purchase real estate located in Baltimore, Maryland, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, as alleged in Count One of this Superseding Indictment, which is incorporated herein by reference, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

18 U.S.C. § 1956(a)(1)(B)(i)

18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), in the event of the defendants' convictions under Counts One through Eleven of this Superseding Indictment.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in the in Counts One, Five, Six, Nine, Ten, Eleven and Twelve incorporated here, the defendant(s) convicted of such offense(s), shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s); and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s).

Firearms Forfeiture

3. Pursuant to 18 U.S.C. § 924(d), upon conviction of an offense alleged in Counts Two, Three, Four, Seven, Eight, Thirteen and Fourteen incorporated here, the defendant(s) convicted of such offense(s) shall forfeit to the United States any firearms and ammunition involved in those offense(s).

Money Laundering Forfeiture

5. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of the offense alleged in Count Fifteen, the Defendant:

**ANTON WILLIAMS,
a/k/a "TWAN,"**

shall forfeit to the United States of America, all property real or personal, involved in such offense, and all property traceable to such property he obtained.

6. The property to be forfeited includes, but is not limited to, the following:

- a. a sum of money equal to the value of any property involved in the money laundering offense for which each Defendant is convicted;
- b. all property constituting the subject matter of the money laundering offense for which each Defendant has been convicted; and,
- c. all property used to commit or facilitate the commission of the money laundering offense for which each Defendant has been convicted.

Substitute Assets

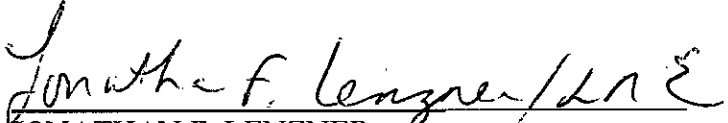
7. Pursuant to Title 21, United States Code, Section 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the

Defendants:

- d. cannot be located upon the exercise of due diligence;
- e. has been transferred or sold to, or deposited with, a third person;
- f. has been placed beyond the jurisdiction of the Court;
- g. has been substantially diminished in value; or
- h. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendants up to the value of the property charged with forfeiture in the paragraphs above.

21 U.S.C. § 853
18 U.S.C. § 924(d)
18 U.S.C. § 982(a)(1)
28 U.S.C. § 2461(c)


JONATHAN F. LENZNER
Acting United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

For person

4-21-21
Date